

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

|                                      |   |                             |
|--------------------------------------|---|-----------------------------|
| PRINCETON DIGITAL IMAGE CORPORATION, | ) |                             |
|                                      | ) |                             |
| PLAINTIFF,                           | ) |                             |
|                                      | ) |                             |
| V.                                   | ) |                             |
|                                      | ) | CASE NO.: 1:12-CV-00779-RJS |
| HEWLETT-PACKARD COMPANY,             | ) |                             |
| FUJIFILM NORTH AMERICA               | ) | ECF CASE                    |
| CORPORATION F/K/A FUJIFILM U.S.A.,   | ) |                             |
| INC. AND XEROX INTERNATIONAL         | ) |                             |
| PARTNERS,                            | ) |                             |
|                                      | ) |                             |
| DEFENDANTS.                          | ) |                             |
|                                      |   |                             |

**MEMORANDUM OF LAW IN SUPPORT OF  
PLAINTIFF’S UNOPPOSED MOTION TO REDACT HEARING TRANSCRIPT  
AND FILE UNDER SEAL**

Plaintiff Princeton Digital Image Corporation (“PDIC”), by and through the undersigned counsel, Duane Morris LLP, hereby submits this memorandum of law in support of its request to file under seal certain portions of the transcript from the Court’s May 17, 2012 hearing (the “Transcript”) to be publicly available and to file the un-redacted version of the Transcript under seal.

In the May 17, 2012 hearing, the parties conducted oral argument with respect to the Motion to Dismiss for Lack of Standing Pursuant to Federal Rule of Civil Procedure 12(b)(1) filed by defendants Hewlett-Packard Company, Fujifilm North America Corporation, and Xerox International Partners. During that hearing, the parties and the Court disclosed information from documents (“Protected Information”) that were filed under seal pursuant to this Court’s Order dated April 24, 2012. Accordingly, PDIC respectfully requests that portions of the Transcript which disclose Protected Information be redacted from the public version of the Transcript and

that the un-redacted version of the Transcript be filed under seal, consistent with this Court's Order dated April 24, 2012. The portions of the hearing transcript which PDIC seeks to redact are highlighted in Exhibit A to the Declaration of R. Terry Parker.

Dated: June 14, 2012

Respectfully submitted,

By: /s/  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that pursuant to Fed. R. Civ. P. 5(d) all counsel of record were served with a correct copy of the foregoing by CM/ECF Electronic Service on this the 14<sup>th</sup> day of June 2012.

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